7

8 9

11

10

12 13

14 15

16

17

18 19

20

22

21

23 24

25

26

28

Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C.

First Library Square

1114 Fremont Ave. South Pasadena, CA 91030

Tel: 626-799-9797 Fax: 626-799-9795 TPRLAW@att.net

Attorneys for Plaintiff J & J Sports Productions, Inc.

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

J & J Sports Productions, Inc.,

Plaintiff,

VS.

Salvador Medinarios,

Defendant.

Case No. CV 08-0998 RS

REQUEST TO ENTER DEFAULT

#### TO: THE CLERK OF THE ABOVE-ENTITLED COURT:

Plaintiff, J & J Sports Production, Inc., hereby requests that the Clerk of the above-entitled Court enter default in this matter against Defendant Salvador Medinarios, individually and d/b/a The Derby, on the grounds that said Defendant has failed to appear or otherwise respond to the Summons and Complaint within the time prescribed by the Federal Rules of Civil Procedure.

///

Said Defendant was duly served with the Summons and Complaint, evidenced by the Proofs of Service on file with this Court. Dated: June 11, 2008 

/s/ Thomas P. Riley

## LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley Attorneys for Plaintiff J & J Sports Production, Inc.

3

4

5 6 7

8

10 11

12 13

14 15

16 17

18

19

20

21 22

23

24

2526

27

28

#### PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 11, 2008, I served:

### REQUEST TO ENTER DEFAULT

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Salvador Medinarios (Defendant) 2036 Ridgemont Drive San Jose, CA 95148

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 11, 2008, at South Pasadena, California.

Dated: June 11, 2008 /s/ Inesa Mamidjanyan

INESA MAMIDJANYAN

1 2 3	Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 1114 Fremont Ave. South Pasadena, CA 91030	
5	Tel: 626-799-9797 Fax: 626-799-9795 TPRLAW@att.net	
6	Attorneys for Plaintiff J & J Sports Productions, Inc. UNITED STATES DISTRICT COURT	
7		
8	NORTHERN DISTRICT OF CALIFORNIA	
9	J & J Sports Productions, Inc.	Case No. CV 08-0998 RS
10	o & o sports i roductions, inc.	
11	Plaintiff,	AFFIDAVIT OF PLAINTIFF'S
12	vs.	COUNSEL IN SUPPORT OF PLAINTIFF'S REQUEST TO
13		ENTER DEFAULT
14	Salvador Medinarios,	
15	Defendant.	
16		
17		
18	To: The Clerk of the above-entitled Cou	rt:
19		
20	I, Thomas P. Riley, declare as follows:	
21		
22	1. I am the attorney for J & J Sports Productions, Inc., in the above-entitled	
23	action.	
24	2. On May 10, 2008, Defendant was duly served with Summons and	
25	Complaints and supplemental suit papers filed in this action.	
26	3. On or about May 19, 2008, the Proof of Service, evidencing same were	
27	filed with the Court.	
	THOU WILL HIC COURT.	

28

The Defendant has not appeared in this action and has not responded to the 1 4. 2 Complaint within the time permitted by law. 3 5. Defendant is not infant, incompetent persons, or person in military service or otherwise exempted from default judgment under the Soldiers' and Sailors' Civil 5 Relief Act of 1940. 6 Plaintiff respectfully requests default in its favor. 6. 7 8 I declare under the penalty of perjury of the laws of the State of California and 9 the United States of America that the above is true and correct. 10 11 12 Respectfully submitted, 13 14 15 16 Dated: June 11, 2008 /s/ Thomas P.Riley 17 LAW OFFICES OF THOMAS P. RILEY, P.C. 18 By: Thomas P. Riley 19 Attorneys for Plaintiff J & J Sports Productions, Inc. 20 /// 21 /// 22 /// 23 24 /// 25 /// 26 27 28

Document 8-2

Filed 06/11/2008

Page 2 of 3

Case 5:08-cv-00998-JF

### PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 11, 2008, served:

# AFFIDAVIT OF PLAINTIFF'S COUNSEL IN SUPPORT OF PLAINTIFF'S REQUEST TO ENTER DEFAULT

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Salvador Medinarios (Defendant) 2036 Ridgemont Drive San Jose, CA 95148

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 11, 2008, at South Pasadena, California.

Dated: June 11, 2008

/s/ Inesa Mamidjanyan
INESA MAMIDJANYAN

Page 3